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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA**

In re:	)	Case No.: 23-15619-HLB
	)	
RAWHIDE MINING LLC,	)	Chapter 11
	)	
	)	
Debtor.	)	Hearing Date: January 26, 2024
	)	Hearing Time: 1:30 p.m.
	)	

STATE OF NEVADA )  
COUNTY OF CLARK ) ss:

**DECLARATION OF SAMUEL A. SCHWARTZ, ESQ. IN SUPPORT OF  
DEBTORS' MOTION FOR ADMINISTRATIVE ORDER ESTABLISHING  
PROCEDURES FOR INTERIM MONTHLY COMPENSATION AND  
REIMBURSEMENT OF EXPENSES OF PROFESSIONALS**

I, Samuel A. Schwartz, Esq., being duly sworn, deposes and says:

1. I am the principal of Schwartz Law, PLLC ("SL"), located at 601 East Bridger Avenue, Las Vegas, Nevada 89101.

2. I am admitted to practice in the Supreme Court of Nevada, and the United States District Court for the District of Nevada, the Supreme Court of Illinois, the United States District Court for the Northern District of Illinois, the Supreme Court of Florida, the United States District Court for the Southern District of Florida, the Supreme Court of Arizona, the United States District Court for the District of Arizona, the Bankruptcy Appellate Panel for the Ninth Circuit Court of Appeals, the Ninth Circuit Court of Appeals and the United States Supreme Court.

1           3.       I am authorized to make this declaration (the “**Declaration**”). I am over the age of  
2 18, and I am mentally competent.

3           4.       SL is the proposed general bankruptcy counsel of Rawhide Mining LLC  
4 (“**Rawhide**”) and Rawhide Acquisition Holding LLC (“**Holding**” and, together with Rawhide, the  
5 “**Debtors**”), the debtors and debtors-in-possession in the above-referenced proposed jointly  
6 administered Chapter 11 cases. In my capacity as principal of SL and the Debtors’ proposed general  
7 bankruptcy and reorganization counsel, I am generally familiar with SL’s and the Debtors’ daily  
8 business, operations, and financial affairs.

9           5.       Except as otherwise indicated, the facts set forth in this Declaration are based upon  
10 my personal knowledge of the Debtors’ and SL’s operations and finances, information learned from  
11 my review of relevant documents, and/or information supplied to me by the Debtors’ and/or SL’s  
12 employees. If called upon to testify as to the content of this Declaration, I could and would do so.

13           6.       This Declaration is submitted in support of the Debtors’ *Motion for an*  
14 *Administrative Order Establishing Procedures for Interim Monthly Compensation and*  
15 *Reimbursement of Expenses of Professionals* (the “**Motion**”).<sup>1</sup>

16           7.       By the Motion, the Debtors request entry of an order authorizing and establishing  
17 procedures for interim compensation and reimbursement of expenses of Professionals on a monthly  
18 basis, and comparable to those procedures established in other large Chapter 11 cases filed in this  
19 District and the Ninth Circuit. Such an order would enable this Court and all other parties to  
20 monitor the Professionals’ fees incurred in the Chapter 11 Cases more efficiently.

21           8.       The Debtors’ Chapter 11 Cases will generate and require a substantial volume of  
22 professional work, and thereby the accrual of fees by the various estate Professionals in amounts  
23 large enough to unduly burden the Professionals, including SL, it appears that, to the extent  
24 otherwise necessary, fees would be recoverable.

25           9.       The requested procedures herein will enable all parties to monitor costs of  
26 administration, the Debtors to maintain level cash flow, and implement efficient cash management

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27 <sup>1</sup> Capitalized terms used herein, but not otherwise defined, shall have those meanings ascribed to them  
28 in the Motion.

1 procedures.

2 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
3 and correct to the best of my knowledge and belief.

4 DATED: December 29, 2023

5 /s/ Samuel A. Schwartz  
6 Samuel A. Schwartz, Esq.  
7 601 East Bridger Avenue  
8 Las Vegas, NV 89101  
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